

# **EXHIBIT T**

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SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

9 BLC WATER COMPANY, LLC, INDIANA  
10 WATER TECHNOLOGY, LLC,  
11 COLEWSTECH, LLC, RCWSTECH 1157,  
12 LLC, ROYAL RESERVOIRS, LLC,  
13 CHAURISHI RETAIL ENTERPRISES, LLC,  
14 KDAWG CRYPTO, LLC, PACIFIC WATER  
15 TECHNOLOGY, LLC, KWANSOO LEE,  
16 DDS, PLLC, KWANSOO LEE, BRIAN CHU,  
17 BRIAN CHU DDS, INC., LARINA CHU,  
18 LAURINA CHU DDS, INC., BRIAN AND  
19 LAURINA CHU DDS, INC., DAVID  
20 SCHROEDER, SARAH SCHROEDER, RON  
21 COLE, KAREN LAVIN, BASANT KUMAR,  
22 DEREN FLESHER, TYLER SADEK,  
23 NATALIE SADEK, AND FOUNDERS  
24 MOSAIC PARTNERS, LLC,

Plaintiffs,

v.

25 FIRST FED BANK, FIRST NORTHWEST  
26 BANCORP, NORMAN TONINA, CRAIG  
27 CURTIS, JENNIFER ZACCARDO, CINDY  
28 FINNIE, DANA BEHAR, MATTHEW  
29 DEINES, SHERILYN ANDERSON,  
30 GABRIEL GALANDA, LYNN  
31 TERWOERDS, JOHN DOES 1-10,

Defendants.

No. 24-2-20247-1 SEA

**PLAINTIFFS' FIRST REQUESTS FOR  
PRODUCTION TO FIRST FED BANK  
AND FIRST NORTHWEST BANCORP**

RELATED CASES:

No. 24-2-12567-1 SEA  
No. 24-2-19871-7 SEA  
No. 24-2-10753-3 SEA  
No. 24-2-08418-5 SEA

Pursuant to Civil Rules 26, 33 and 34, Plaintiffs hereby propounds their First Interrogatories and Requests for Production (“Discovery Requests”) to Defendant First Fed Bank and First Northwest Bancorp (“you” or “your”).

### **INSTRUCTIONS**

1. These requests are directed to you and cover all information in your possession, custody, and control, including information in the possession, custody, and control of Defendant, including without limitation your current or former officers or directors, employees, agents, servants, representatives, your attorneys, or other persons directly or indirectly employed or retained by you, or anyone else acting on your behalf or otherwise subject to your control, and any merged, consolidated, or acquired predecessor or successor, parent, subsidiary, division or affiliate.

2. Unless otherwise specifically provided herein, the documents that must be produced in response to the following requests for production include all responsive documents prepared, sent, dated, received, used, or in effect at any time during the period of January 1, 2015 through the present, including the date of any supplemental response (“the discoverable period”).

3. Use of the singular or plural in these requests should not be deemed a limitation and the use of the singular should be construed to include, where appropriate, the plural. The conjunctive form “and” and the disjunctive form “or” are mutually interchangeable and encompass each other. The terms “any” and “all” are mutually interchangeable and encompass each other.

4. Plaintiffs request that any documents withheld in whole or in part from production based on a claim of privilege are assigned unique document control numbers; and each attachment to a document shall be treated as a separate document and separately logged,

1 if withheld, and cross referenced, if produced. Please also provide a statement of the claim of  
2 privilege and all facts relied upon in support of the decision to withhold each document, in the  
3 form of a log, which, for each document withheld, states:

- 4 a. The document's control numbers;
- 5 b. All authors of the document;
- 6 c. All addressees of the document;
- 7 d. All recipients of the document, or of any copies of the document to the  
extent not included among the document's addressees;
- 8 e. The date of the document;
- 9 f. The nature or type of the privilege that you are asserting for the document  
(e.g. "attorney-client privilege");
- 10 g. A description of the subject matter of the document, describing the  
nature of the document in a manner that, while not revealing information  
that is itself privileged, provides sufficiently detailed information to  
enable Plaintiff to assess the applicability of the privilege claimed;
- 11 h. The request to which the document is responsive;
- 12 i. The document control numbers of any attachments to the document,  
regardless of whether any privilege is being asserted for such  
attachments; and
- 13 j. Whether the document has been produced in partially redacted form or  
withheld entirely.

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22 5. The definition of "document" used herein includes data stored in any electronic  
form. You are required to review such data and determine whether it contains material  
responsive to these requests. If you have not already done so, you should immediately take all  
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1 steps necessary to preserve the following categories of electronic data that contain information  
2 responsive to Plaintiff's discovery requests:

- 3 a. All electronic mail, information about electronic mail (including but not  
4 limited to information on message contents, header information, and logs  
5 of electronic mail system usage), any attachments, and any other  
6 electronic communications including any data from instant messaging  
7 programs, internet relay chat systems, or any voicemail programs  
8 containing information responsive to these requests;
- 9 b. All files containing information from electronic calendars or scheduling  
10 programs responsive to these requests;
- 11 c. All user-created files (including but limited to word processing files,  
12 spreadsheets, and slide presentations) that contain information  
13 responsive to these requests;
- 14 d. All databases (including all records and fields and structural information  
15 in such databases) or other data files that contain any information (such  
16 as sales, pricing, customer, financial, accounting, and billing  
17 information) responsive to these requests;
- 18 e. All logs of activity on computer systems that may have been used to  
19 process or to store electronic data containing information responsive to  
20 these requests;
- 21 f. All electronic data files created or used by spreadsheet programs that  
22 contain information responsive to these requests; and
- 23 g. All other electronic data containing information that is responsive to  
24 these requests.

1       6. Unless otherwise requested, electronic documents (*e.g.*, email) and data shall be  
2 produced in searchable electronic format as follows:

3           a. Unless otherwise stated, the requested production format for all  
4 documents is single page TIFF images with multi-page text files, load  
5 files and native links. The load file should be produced in a format  
6 capable of being imported into Relativity litigation software. The  
7 parties may confer on specific metadata fields and may agree to a  
8 different form of production. In all cases, however, you should  
9 produce documents in native format, or such other format upon which  
10 the parties mutually agree, and, in all cases, preserving original  
11 metadata and source information;

12          b. All image files should include an OCR text file;

13          c. All files should be labeled with a Bates or control number;

14          d. Parent/child attachment relationships should be maintained;

15          e. All image files should have a minimum resolution of 300 dpi and meet  
16 commonly accepted production standards to ensure that the image file is  
17 reliable and authentic;

18          f. The metadata fields should include: DocID, EndDoc, Document Date,  
19 Sent Date (for email), File Name, Email Subject, File Type or File  
20 Extension, Email To, Email From, Email CC, Author, Link to native file,  
21 Begattach/Endattach or attachrange, File Extension, MD5 Hash, and  
22 Custodian;

23          g. PowerPoint and Excel documents should be produced in native format  
24 with all metadata preserved, including speaker notes. Spreadsheets

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created with other software should be produced in a comma delimited format capable of being opened in Excel;

- h. All hard copy documents for which native electronics files never existed, no longer exist, or are not reasonably accessible also should be produced in single TIFF format. This includes, but is not limited to, scanned images of those documents which contain unique information after they were printed out, such as paper documents containing handwriting, signatures, marginalia, drawings, annotations, highlighting, and redactions. All scanned documents should be kept as they are in regular course of business or in the alternative provide information identifying the custodian for each document; and
- i. Audio, video, or other recorded information shall be provided separately on a DVD or other storage device capable of being played on Windows in a .wav or .mpeg format.

7. If any document responsive to these requests is no longer in your possession, custody, or control, state (i) what was done with the document; (ii) the identity and contact information of the current custodian of the document; (iii) the reason for the transfer or disposition of the document; and (iv) the identity and contact information of the person who made the decision to transfer or dispose of the document.

8. If any document request cannot be answered fully, please provide as full an answer as possible, with a complete statement of the reason for the inability to fully respond.

9. The propounding party acknowledges the possibility that you may object to a particular document request as vague or burdensome. A party cannot always determine in advance which requests might genuinely be vague or unduly burdensome to the opposing

1 party. It is anticipated that you will respond to all Requests for Production to the best of your  
2 ability and in good faith, preserving any bona fide objections if necessary. It is further  
3 anticipated, and good practice would certainly dictate, that you will promptly attempt to obtain  
4 clarification regarding requests from the undersigned (who stand ready and willing to provide  
5 any such clarity) if the facts of the particular situation so require. When in doubt, the request  
6 should be interpreted consistent with their common meaning and standard English dictionary.  
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8 10. These requests are continuing and, to the full extent required under CR 26(e),  
9 you must seasonably supplement your responses upon the discovery of new or additional  
information.

10 **DEFINITIONS**

11 As used herein:

12 1. "Document(s)" means the original or any non-identical copies of all written,  
13 recorded, graphic material and all electronic data of every kind, whether prepared by you or  
14 by any other person, including drafts, that is in your possession, custody, or control, including  
15 but not limited to: memoranda, reports, letters, telegrams, and other communications recorded  
16 in any form or medium; notes, minutes, and transcripts of conferences, meetings and telephone  
17 or other communications; contracts and other agreements; checks, check registers, statements,  
18 ledgers, and other records of financial matters or commercial transactions; appointment books,  
19 calendars, notebooks, and diaries, including data in PDAs; maps, diagrams, graphs, and charts;  
20 plans and specifications; publications; photographs; photocopies; microfilm; and other copies  
21 or reproductions; computer printouts, tallies, tabulations, and summaries of sales or bids; and  
22 all file folders, file tabs, folder tabs, mailing envelopes, facsimile transmission cover sheets,  
23 and any other proof or indicia of mailing (if applicable) associated with each original. The  
24 term "document" includes spreadsheets, as well as underlying cell formulae and other codes.  
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1       The term “document” also includes electronic mail messages and other documents and data  
2       stored in, or accessible through, computer or other information retrieval systems, such as  
3       personal computers, workstations, minicomputers, personal data assistants, archival voice  
4       storage systems, group and collaborative tools, electronic messaging devices, portable or  
5       removable storage media, mainframes, servers, backup disks and tapes, archive disks and  
6       tapes, and other forms of online or offline storage, whether on or off of your premises. The  
7       term “document” includes all data (including metadata, embedded, hidden and other  
8       bibliographic or historical data describing or relating to documents created, revised, or  
9       distributed on computer systems) stored in electronic form or accessible through computer or  
10      other information retrieval systems, together with instructions and all other materials necessary  
11      to use or interpret this data. Unless specifically requested, the term “document” excludes non-  
12      electronic forms of invoices, bills of lading, purchase orders, customs declarations, and other  
13      similar documents of a purely transactional nature. The reference to specific types, categories,  
14      or formats of documents in any specific Request for Production in no way limits or diminishes  
15      the scope of the term “document” for purposes of the request.

16           2.       “Communication(s)” means any oral or written expression, disclosure, transfer,  
17       transmission, or exchange of information or any nonverbal conduct of a person intended by  
18       that person to be a substitute for an oral or written expression, disclosure, transfer,  
19       transmission, or exchange of information, in whatever form, by whatever means, including,  
20       but not limited to, oral, written, face-to-face, email, telephone, facsimile, electronic, text  
21       messages, voicemail, postal mail, personal delivery, or otherwise.

22           3.       “Identify” means:

1           a. In the case of a person other than a natural person, its legally registered  
2           name, the address of its principal place of business, its telephone number,  
3           and the name of its chief executive officer;

4           b. In the case of a natural person, his or her full name (including middle  
5           name), home address and telephone number, business address and phone  
6           number, last known cellular or mobile telephone number(s), their last  
7           known employer, the positions held by each person during the  
8           discoverable period, and the dates of tenure in each such position; and

9           c. In the case of a communication, its date, its type (e.g., telephone  
10          conversation, letter, electronic mail, or meeting), the place where it  
11          occurred, the identity of the persons who made it, the identity of the  
12          persons who received it or who were present when it was made, and the  
13          subject matter discussed.

14         4. “Relating to” or “relate to” or “regarding” means directly or indirectly refer or  
15          pertain to, discuss, describe, reflect, contain, examine, analyze, study, report on, comment on,  
16          evidence, constitute, show, consider, recommend, concern, record, or set forth, in whole or in  
17          part.

18         5. “You” or “Your” or “First Fed” means First Fed Bank and/or First Northwest  
19          Bancorp and or any of their partners, owners, members, agents, affiliates, subsidiaries, parents,  
20          servants, employees, officers, successors, licensees, partners, contractors (including, but not  
21          limited to, Turning Point), and assigns, and all persons acting in concert or participation with  
22          each or any of them or on any of their behalf.

23         6. “Houk” or “Larry Houk” means Defendant Larry Houk and/or Northwest  
24          Financial Services, LLC, and/or any person or entity acting on their behalf.  
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7. "Nooney" or "Kevin Nooney" means Defendant Kevin Nooney and/or any person or entity acting on his behalf.

8. "Unibank" means UniBank and/or its partners, owners, members, agents, affiliates, subsidiaries, parents, servants, employees, officers, successors, licensees, partners, contractors, and assigns, and all persons acting in concert or participation with each or any of them or on their behalf.

9. "Turning Point" means TurningPointe LLC d/b/a Turning Point Strategic Advisors and/or any of its partners, owners, members, agents, affiliates, subsidiaries, parents, servants, employees, officers, successors, licensees, partners, contractors, and assigns, and all persons acting in concern or participation with each or any of them or on their behalf

10. The term “Wear” refers to Ryan Wear and/or the business known as “WaterStation Technology,” and any of its present and former affiliates, subsidiaries, agents, employees, servants, attorneys, representatives, and any and all persons acting or who have acted for or on their behalf, including, without limitation, Kevin Nooney or Larry Houk.

## **REQUESTS FOR PRODUCTION**

**REQUEST FOR PRODUCTION NO. 1:** Produce all documents and communications sent to or received from Wear referencing and/or related to any of the following:

- a) Loan inquiries or applications submitted by Wear and your review, investigation, and/or evaluation of such inquiries and/or applications;
- b) Loans to Wear and/or any underwriting or pre- or post-closing due diligence activities relating to any such loans;
- c) Loan inquiries, applications, and/or information submitted by or on behalf of any actual or potential investor in Wear, including but not limited to the Plaintiffs in this action to whom First Fed issued loans;

1           d) Loans to Plaintiffs or any other investor in Wear and/or any underwriting or pre- or post-  
2           closing due diligence activities relating to any such loans;

3           e) Information regarding any Wear-related collateral, including, without limitation, real  
4           estate, water vending machines, leases, and/or equipment lists;

5           f) Referrals to or from Wear;

6           g) Commissions or compensation paid to Houk;

7           h) Any and all agreements or loan programs with Wear, including without limitation credit  
8           referral and/or enhancement agreements, and all drafts thereof;

9           i) Investments in Wear;

10          j) Potential investors in Wear;

11          k) The qualifications and/or financial means of investors in Wear;

12          l) Wear's business and/or financial information;

13          m) Wear's business practices, credit worthiness, and/or financial condition; and/or

14          n) Wear's solvency and/or ability to satisfy obligations.

15          **RESPONSE:**

17          **REQUEST FOR PRODUCTION NO. 2:** Produce all documents and communications sent  
18          to or received from Larry Houk referencing and/or relating to any of the following:

19           a) Loan inquiries or applications submitted by Wear and your review, investigation, and/or  
20           evaluation of such inquiries and/or applications;

21           b) Loans to Wear and/or any underwriting or pre- or post-closing due diligence activities  
22           relating to any such loans;

- c) Loan inquiries, applications, and/or information submitted by or on behalf of any actual or potential investor in Wear, including but not limited to the Plaintiffs in this action to whom First Fed issued loans;
- d) Loans to Plaintiffs or any other investor in Wear and/or any underwriting or pre- or post-closing due diligence activities relating to any such loans;
- e) Information regarding any Wear-related collateral, including, without limitation, real estate, water vending machines, leases, and/or equipment lists;
- f) Referrals to or from Wear;
- g) Commissions or compensation paid to Houx;
- h) Any and all agreements or loan programs with Wear, including without limitation credit referral and/or enhancement agreements, and all drafts thereof;
- i) Investments in Wear;
- j) Potential investors in Wear;
- k) The qualifications and/or financial means of investors in Wear;
- l) Wear's business and/or financial information;
- m) Wear's business practices, credit worthiness, and/or financial condition; and/or
- n) Wear's solvency and/or ability to satisfy obligations.

### **RESPONSE:**

**REQUEST FOR PRODUCTION NO. 3:** Produce all documents and communications sent to or received from Kevin Nooney referencing and/or related to any of the following:

- a) Loan inquiries or applications submitted by Wear and your review, investigation, and/or evaluation of such inquiries and/or applications;

1           b) Loans to Wear and/or any underwriting or pre- or post-closing due diligence activities  
2           relating to any such loans;

3           c) Loan inquiries, applications, and/or information submitted by or on behalf of any actual  
4           or potential investor in Wear, including but not limited to the Plaintiffs in this action to  
5           whom First Fed issued loans;

6           d) Loans to Plaintiffs or any other investor in Wear and/or any underwriting or pre- or post-  
7           closing due diligence activities relating to any such loans;

8           e) Information regarding any Wear-related collateral, including, without limitation, real  
9           estate, water vending machines, leases, and/or equipment lists;

10          f) Referrals to or from Wear;

11          g) Commissions or compensation paid to Houk;

12          h) Any and all agreements or loan programs with Wear, including without limitation credit  
13           referral and/or enhancement agreements, and all drafts thereof;

14          i) Investments in Wear;

15          j) Potential investors in Wear;

16          k) The qualifications and/or financial means of investors in Wear;

17          l) Wear's business and/or financial information;

18          m) Wear's business practices, credit worthiness, and/or financial condition; and/or

19          n) Wear's solvency and/or ability to satisfy obligations.

20          **RESPONSE:**

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23          **REQUEST FOR PRODUCTION NO. 1:** Produce all documents and communications sent  
24          to or received from Turning Point referencing and/or related to any of the following:  
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1           a) Loan inquiries or applications submitted by Wear and your review, investigation, and/or  
2           evaluation of such inquiries and/or applications;

3           b) Loans to Wear and/or any underwriting or pre- or post-closing due diligence activities  
4           relating to any such loans;

5           c) Loan inquiries, applications, and/or information submitted by or on behalf of any actual  
6           or potential investor in Wear, including but not limited to the Plaintiffs in this action to  
7           whom First Fed issued loans;

8           d) Loans to Plaintiffs or any other investor in Wear and/or any underwriting or pre- or post-  
9           closing due diligence activities relating to any such loans;

10          e) Information regarding any Wear-related collateral, including, without limitation, real  
11           estate, water vending machines, leases, and/or equipment lists;

12          f) Referrals to or from Wear;

13          g) Commissions or compensation paid to Houk;

14          h) Any and all agreements or loan programs with Wear, including without limitation credit  
15           referral and/or enhancement agreements, and all drafts thereof;

16          i) Investments in Wear;

17          j) Potential investors in Wear;

18          k) The qualifications and/or financial means of investors in Wear;

19          l) Wear's business and/or financial information;

20          m) Wear's business practices, credit worthiness, and/or financial condition; and/or

21          n) Wear's solvency and/or ability to satisfy obligations.

22          **RESPONSE:**

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1           **REQUEST FOR PRODUCTION NO. 2:** Produce all documents and communications sent  
2 to or received from Unibank referencing and/or relating to any of the following:  
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- 4       a) Loan inquiries or applications submitted by Wear and your review, investigation, and/or  
5           evaluation of such inquiries and/or applications;
- 6       b) Loans to Wear and/or any underwriting or pre- or post-closing due diligence activities  
7           relating to any such loans;
- 8       c) Loan inquiries, applications, and/or information submitted by or on behalf of any actual  
9           or potential investor in Wear, including but not limited to the Plaintiffs in this action to  
10          whom First Fed issued loans;
- 11      d) Loans to Plaintiffs or any other investor in Wear and/or any underwriting or pre- or post-  
12          closing due diligence activities relating to any such loans;
- 13      e) Information regarding any Wear-related collateral, including, without limitation, real  
14          estate, water vending machines, leases, and/or equipment lists;
- 15      f) Referrals to or from Wear;
- 16      g) Commissions or compensation paid to Houk;
- 17      h) Any and all agreements or loan programs with Wear, including without limitation credit  
18          referral and/or enhancement agreements, and all drafts thereof;
- 19      i) Investments in Wear;
- 20      j) Potential investors in Wear;
- 21      k) The qualifications and/or financial means of investors in Wear;
- 22      l) Wear's business and/or financial information;
- 23      m) Wear's business practices, credit worthiness, and/or financial condition; and/or
- 24      n) Wear's solvency and/or ability to satisfy obligations.

25           **RESPONSE:**

1           **REQUEST FOR PRODUCTION NO. 6:** To the extent not produced in response to previous  
2 requests, produce all documents and communications with any party or third party (other than  
3 your legal counsel) referencing and/or related to any of the following:  
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- 5           a) Loan inquiries or applications submitted by Wear and your review, investigation, and/or  
6           evaluation of such inquiries and/or applications;
- 7           b) Loans to Wear and/or any underwriting or pre- or post-closing due diligence activities  
8           relating to any such loans;
- 9           c) Loan inquiries, applications, and/or information submitted by or on behalf of any actual  
10          or potential investor in Wear, including but not limited to the Plaintiffs in this action to  
11          whom First Fed issued loans;
- 12          d) Loans to Plaintiffs or any other investor in Wear and/or any underwriting or pre- or post-  
13          closing due diligence activities relating to any such loans;
- 14          e) Information regarding any Wear-related collateral, including, without limitation, real  
15          estate, water vending machines, leases, and/or equipment lists;
- 16          f) Referrals to or from Wear;
- 17          g) Commissions or compensation paid to Houk;
- 18          h) Any and all agreements or loan programs with Wear, including without limitation credit  
19          referral and/or enhancement agreements, and all drafts thereof;
- 20          i) Investments in Wear;
- 21          j) Potential investors in Wear;
- 22          k) The qualifications and/or financial means of investors in Wear;
- 23          l) Wear's business and/or financial information;
- 24          m) Wear's business practices, credit worthiness, and/or financial condition; and/or
- 25          n) Wear's solvency and/or ability to satisfy obligations.

1           **RESPONSE:**

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3       **REQUEST FOR PRODUCTION NO. 7:** Produce all documents and communications  
4       referencing and/or related to whether any loans to Wear, loans to fund any investor's investment  
5       in WST, and/or loan programs or portfolio related to Wear comply with and/or violate U.S.  
6       Small Business Administration ("SBA") rules, policies, guidelines, regulations and/or  
7       standards.

8           **RESPONSE:**

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10       **REQUEST FOR PRODUCTION NO. 8:** Produce all documents and communications  
11       referencing and/or related to whether any loans to Wear, loans to fund any investor's investment  
12       in Wear, and/or loan programs or portfolio related to Wear comply with and/or violate Federal  
13       Deposit Insurance ("FDIC") rules, policies, guidelines, regulations and/or standards.

14           **RESPONSE:**

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16       **REQUEST FOR PRODUCTION NO. 9:** Produce all documents and communications  
17       referencing and/or related to whether any loans to Wear, loans to fund any investor's investment  
18       in Wear, and/or loan programs or portfolio related to Wear comply with and/or violate  
19       Washington State Department of Financial Institutions ("DFI") rules, policies, guidelines,  
20       regulations and/or standards.

21           **RESPONSE:**

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23       **REQUEST FOR PRODUCTION NO. 10:** Produce all documents and communications  
24       referencing and/or related to whether any loans to Wear, loans to fund any investor's investment  
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1 in Wear, and/or loan programs or portfolio related to Wear comply with and/or violate your  
2 internal rules, policies, guidelines, regulations and/or standards.

3 **RESPONSE:**

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5 **REQUEST FOR PRODUCTION NO. 11:** Produce all documents and communications sent  
6 to or received from the SBA, FDIC, or DFI, referencing and/or related to Wear and/or loans to  
7 Wear investors.

8 **RESPONSE:**

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10 **REQUEST FOR PRODUCTION NO. 12:** Produce all documents and communications sent  
11 to or received from FDIC referencing and/or related to Wear and or loans to Wear investors.

12 **RESPONSE:**

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14 **REQUEST FOR PRODUCTION NO. 13:** Produce all documents and communications sent  
15 to or received from DFI referencing and/or related to Wear and or loans to Wear investors.

16 **RESPONSE:**

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18 **REQUEST FOR PRODUCTION NO. 14:** To the extent not produced in response to the  
19 previous requests stated herein, produce all documents and communications referencing and/or  
20 related to any supervision, evaluation, and/or investigation conducted by DFI, SBA, FDIC,  
21 and/or any other state or federal agency or regulatory entity referencing and/or related to Wear  
22 and or loans to Wear investors.

23 **RESPONSE:**

1           **REQUEST FOR PRODUCTION NO. 15:** Produce all commercial lending rules, policies,  
2           guidance, and/or procedures regarding loan eligibility, loan products, loan staff and loan  
3           committees, loan underwriting and/or due diligence, transactions with brokers, loan approval,  
4           loan closing, loan monitoring, portfolio management, delinquency, loan foreclosure and/or loan  
5           write-offs.

6           **RESPONSE:**

7

8           **REQUEST FOR PRODUCTION NO. 16:** Produce all documents and communications  
9           related to secured and unsecured lending authorities of each employee who worked on or  
10          assisted with loans related in any way to WST, including, without limitation, Kasi O'Leary,  
11          Kevin McDaniel, and/or Matt Deines.

12           **RESPONSE:**

13

14           **REQUEST FOR PRODUCTION NO. 17:** Produce all personnel files for each employee  
15          who worked on or assisted with loans related to Wear, including, without limitation, Kasi  
16          O'Leary, Kevin McDaniel, and/or Matt Deines.

17           **RESPONSE:**

18

19           **REQUEST FOR PRODUCTION NO. 18:** Produce all documents and communications  
20          reflecting or related to any meeting minutes, resolutions, directives, or any other corporate  
21          action or oversight by your directors, governors, board of directors, board of governors, and/or  
22          any subcommittee or work group thereof, from January 1, 2019 to present.

23           **RESPONSE:**

1           **REQUEST FOR PRODUCTION NO. 19:** Produce all documents and communications  
2 reflecting or related to any meeting minutes, resolutions, directives, or any other corporate  
3 action or oversight by your loan committee and/or members of the loan committee, and/or any  
4 subcommittee or work group thereof, from January 1, 2019 to present.

5           **RESPONSE:**

6

7           **REQUEST FOR PRODUCTION NO. 20:** Produce all documents and communications  
8 reflecting or related to any meeting minutes, resolutions, directives, or any other corporate  
9 action or oversight by your audit committee and/or members of the audit committee, and/or any  
10 subcommittee or work group thereof, from January 1, 2019 to present.

11           **RESPONSE:**

12

13           **REQUEST FOR PRODUCTION NO. 21:** Produce all documents and communications  
14 reflecting and/or related to any reports or findings of internal or external audits or investigations  
15 from January 1, 2019 to present.

16           **RESPONSE:**

17

18           **REQUEST FOR PRODUCTION NO. 22:** To the extent not produced in response to the  
19 previous requests stated herein, complete credit and loan files regarding any and all actual or  
20 potential investors in Wear, including Plaintiffs to whom you issued loans.

21           **RESPONSE:**

22

23           **REQUEST FOR PRODUCTION NO. 23:** Produce a complete record of payments to Larry  
24 Houk and/or Northwest Financial Services LLC from January 1, 2015 to present.

1           **RESPONSE:**

2

3       **REQUEST FOR PRODUCTION NO. 24:** To the extent not produced in response to the  
4 previous requests stated herein, produce all documents and communications reflecting or  
5 related to any contracts and/or agreements with any of the Defendants named herein, including  
6 any drafts related thereto.

7           **RESPONSE:**

8

9       **REQUEST FOR PRODUCTION NO. 25:** Produce all account statements, signature cards,  
10 wire transfer receipts, deposited items, and/or cancelled checks, regarding Wear.

11          **RESPONSE:**

12

13       **REQUEST FOR PRODUCTION NO. 26:** To the extent not produced in response to the  
14 previous requests stated herein, produce all documents and communications reflecting or  
15 related to any suspicious activity reports, AML compliance, FinCen compliance, fraud  
16 prevention and/or fraud alerts, and/or internal compliance with respect to Wear.

17

18          **RESPONSE:**

19

20       **REQUEST FOR PRODUCTION NO. 27:** To the extent not produced in response to the  
21 previous requests stated herein, produce all documents and communications reflecting or  
22 related to any contracts and/or agreements with any of the Plaintiffs named herein to whom you  
23 issued a loan, including any drafts related thereto.

24          **RESPONSE:**

1           **REQUEST FOR PRODUCTION NO. 28:** To the extent not produced in response to the  
2 previous requests stated herein, produce all communications referencing or related to any of the  
3 Defendants named herein.

4           **RESPONSE:**

5

6           **REQUEST FOR PRODUCTION NO. 29:** Produce all documents and communications  
7 referencing and/or related to loans or credit to Wear, including, but not limited to, any  
8 applications for the loans, the approval, issuance, and/or administration of such loans, and/or  
9 the default, workout and/or collateralization of the loans.

10           **RESPONSE:**

11

12           **REQUEST FOR PRODUCTION NO. 30:** Produce all documents and communications  
13 referencing and/or related to whether any loans to Wear, loans to fund any investor's investment  
14 in Wear, and/or loan programs or portfolio related to Wear comply with and/or violate industry  
15 rules, policies, guidelines, regulations and/or standards.

16           **RESPONSE:**

1 DATED this 9th day of September, 2024.

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PLAINTIFFS' FIRST REQUESTS FOR PRODUCTION TO  
FIRST FED BANK AND FIRST NORTHWEST BANCORP  
- 25

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